

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STATE OF DELAWARE, *ex rel.*
KATHLEEN JENNINGS, Attorney General of the
State of Delaware,

Plaintiff,

v.

BP AMERICA INC., BP P.L.C., CHEVRON
CORPORATION,
CHEVRON U.S.A. INC., CONOCOPHILLIPS,
CONOCOPHILLIPS COMPANY, PHILLIPS 66,
PHILLIPS 66 COMPANY, EXXON MOBIL
CORPORATION, EXXONMOBIL OIL
CORPORATION, XTO ENERGY INC., HESS
CORPORATION, MARATHON OIL
CORPORATION, MARATHON OIL COMPANY,
MARATHON PETROLEUM CORPORATION,
MARATHON PETROLEUM COMPANY LP,
SPEEDWAY LLC, MURPHY OIL
CORPORATION, MURPHY USA INC.,
ROYAL DUTCH SHELL PLC, SHELL OIL
COMPANY, CITGO PETROLEUM
CORPORATION, TOTAL S.A., TOTAL
SPECIALTIES USA INC., OCCIDENTAL
PETROLEUM CORPORATION, DEVON
ENERGY CORPORATION, APACHE
CORPORATION, CNX RESOURCES
CORPORATION, CONSOL ENERGY INC.,
OVINTIV, INC., and AMERICAN PETROLEUM
INSTITUTE,

Defendants.

Case No. 1:20-cv-01429-UNA

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, CITGO Petroleum Corporation (“CITGO”) files this Corporate Disclosure Statement, and respectfully states the following:

CITGO is a wholly-owned subsidiary of CITGO Holding, Inc., a Delaware corporation. CITGO Holding, Inc. is a wholly-owned subsidiary of PDV Holding, Inc., a Delaware corporation. PDV Holding, Inc. is a wholly-owned subsidiary of Petróleos de Venezuela, S.A., the national oil company of the Bolivarian Republic of Venezuela.

MORRIS NICHOLS ARSHT & TUNNELL

OF COUNSEL:

Nathan P. Eimer
Pamela R. Hanebutt
Lisa S. Meyer
EIMER STAHL LLP
224 South Michigan Avenue, Suite 1100
Chicago, IL 60604
Tel: (312) 660-7600
neimer@eimerstahl.com
phanebutt@eimerstahl.com
lmeyer@eimerstahl.com

Robert E. Dunn
EIMER STAHL LLP
99 S. Almaden Blvd. Suit 662
San Jose, CA 95113
Tel: (669) 231-8755
rdunn@eimerstahl.com

/s/ Kenneth J. Nachbar

Kenneth J. Nachbar (#2067)
Alexandra M. Cumings (#6146)
1201 North Market Street, 16th Floor
P.O. Box 1347
Wilmington, DE 19899-1347
Tel.: (302) 658-9200
Fax: (302) 422-3013
knachbar@mnat.com
acumings@mnat.com

Attorneys for Defendant CITGO Petroleum Corporation.

Dated: October 27, 2020